

Thomas E. Willoughby
HILL RIVKINS & HAYDEN LLP
45 Broadway, Suite 1500
New York, New York 10006-3739
(212) 669-0600

Attorneys for Defendant, Norman G. Jensen, Inc.
d/b/a Jensen Maritime Service

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
FEDERAL INSURANCE COMPANY,

Index No.
08 CV 03288 (LAK)

Plaintiffs,

ANSWER

- against -

M/V LAHORE EXPRESS, her engines, boilers,
tackle, etc., NORMAN G. JENSEN, INC. D/B/A
JENSEN MARITIME SERVICE, DIRECT
CONTAINER LINE, INC.,

Defendants.

-----X

The defendant, Norman G. Jensen, Inc. d/b/a Jensen Maritime Service, by its attorneys, Hill Rivkins & Hayden LLP, as and for its Answer to plaintiff's Complaint, alleges upon information and belief as follows:

1. Admits the allegations contained in paragraph 1 of the Complaint
2. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Complaint.
3. Defendant, Norman G. Jensen, admits that it is a non-vessel operating common carrier, but denies knowledge and information sufficient to form a belief as to the remaining allegations contained in paragraph 3 of the Complaint.

4. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Complaint.

5. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint.

6. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Complaint.

7. Denies the allegations contained in paragraph 7 of the Complaint.

8. Denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint.

9. Denies the allegations contained in paragraph 9 of the Complaint.

WHEREFORE, defendant, Norman G. Jensen, prays that the foregoing Complaint be dismissed with prejudice, costs and attorney's fees to said defendant and for such other and different relief as the Court may deem proper in the premises.

Dated: New York, New York
May 6, 2008

HILL RIVKINS & HAYDEN LLP
Attorneys for Defendant, Norman G. Jensen, Inc.
d/b/a Jensen Maritime Service

By: 

Thomas E. Willoughby
45 Broadway, Suite 1500
New York, New York 10006-3739
(212) 669-0600

To: KINGSLEY, KINGSLEY & CALKINS
Attorneys for Plaintiff
Attention: Harold M. Kingsley, Esq.
91 West Cherry Street
Hicksville, New York 11801
(516) 931-0064

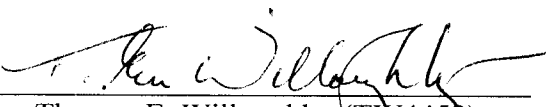
STATE OF NEW YORK)
 : SS:
COUNTY OF NEW YORK)

Thomas E. Willoughby, duly sworn, deposes and says:

He is an attorney and partner with the firm of Hill Rivkins & Hayden LLP, attorneys for defendant, Norman G. Jensen, Inc. d/b/a Jensen Maritime Service; he has read the foregoing Answer and knows the contents thereof; and that the same is true to his own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters, he believes it to be true.

The reason this verification is made by deponent and not by defendant, Norman G. Jensen, Inc. d/b/a Jensen Maritime Service, is that defendant, Norman G. Jensen, Inc. d/b/a Jensen Maritime Service, is a corporation, none of whose officers is now within this district.

The sources of deponent's information and the grounds for his belief as to those matters stated in the Answer to be alleged on information and belief are documents and records in his files.



Thomas E. Willoughby (TW4452)

Sworn to before me this
7th day of May 2008



Notary Public

ROBERT BLUM
Notary Public, State Of New York
No.01BL4914091
Qualified In Kings County
Certificate Filed In New York County
Commission Expires December 7, 2011

Thomas E. Willoughby
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d/b/a Jensen Maritime Service

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FEDERAL INSURANCE COMPANY,

Index No.
08 CV 03288 (LAK)

Plaintiffs,

Affidavit of Service

- against -

M/V LAHORE EXPRESS, her engines, boilers,
tackle, etc., NORMAN G. JENSEN, INC. D/B/A
JENSEN MARITIME SERVICE, DIRECT
CONTAINER LINE, INC.,

Defendants.

-----X

STATE OF NEW YORK, COUNTY OF NEW YORK SS.:

The undersigned, being duly sworn, says: I am not a party to the action, am over 18 years of age and reside in the State of New York.

On May 7, 2008, I served a true copy of the annexed **ANSWER and Rule 7.1 Statement**



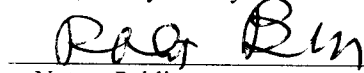
Service
By Mail

by depositing a true copy thereof enclosed in a post-paid wrapper in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

KINGSLEY, KINGSLEY & CALKINS
Attorneys for Plaintiff
Attention: Harold M. Kingsley, Esq.
91 West Cherry Street
Hicksville, New York 11801


Maria G. West

Sworn to before me
This 7 day of May 2008


Notary Public

ROBERT BLUM
Notary Public, State Of New York
No. 01BL4914001
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Commission Expires December 7, 2011